

1 THE HONORABLE CHRISTOPHER M. ALSTON

Hearing Date: October 19, 2023

Hearing Time: 9:30 a.m.

Hearing Location: Seattle

Response Date: October 12, 2023

2 Dorothy A. Bartholomew
3 WSBA No. 20887
4 Dorothy Bartholomew, PLLC
5 5310 12th Street East, Suite C
6 Fife, WA 98424
7 Phone: (253) 922-2016
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9 UNITED STATES BANKRUPTCY COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON

11 In re:

No. 22-11499

12 MIKHAIL NEVLER,

DEBTOR'S RESPONSE TO CHAPTER 13
TRUSTEE'S MOTION TO DISMISS

13 Debtors.

14 COMES NOW THE DEBTOR, Mikhail Nevler, by and through his attorney of record,
15 Dorothy A. Bartholomew, who respectfully submits the below Response to the Chapter 13
16 Trustee's Motion to Dismiss.

17 The Chapter 13 Trustee has moved to dismiss the debtor's case because the debtor is
18 behind on his Chapter 13 Plan payments by \$12, 388.00.

19 The debtor wishes to remain in his Chapter 13. Toward this end the debtor has filed a
20 Motion to modify his chapter 13 plan. Payments will increase so that he can catch up on
21 missed payments. The Motion is set for November 2, 2023, at 9:30 a.m.

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27 Response to Trustee's Motion to Dismiss
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6 **PRAYER FOR RELIEF**

7 Debtor asks the Court to deny the Chapter 13 Trustee's motion to dismiss or in the
8 alternative to continue the Trustee's Motion to November 2, 2023.
9

10 DATED: October 12, 2023

11 /s/Dorothy A. Bartholomew

12 Dorothy A. Bartholomew

13 WSBA No. 20887

14 Attorney for Mikhail Nevler
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28 Response to Trustee's Motion to Dismiss
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